**From**: Powers, Dan [dpowers@bsb.mt.gov]

**Sent**: 1/24/2013 7:49:14 PM

To: Sparks, Sara [sparks.sara@epa.gov]; Greene, Nikia [Greene.Nikia@epa.gov]; Julie DalSoglio

[DalSoglio.JulieLNDU@usepa.onmicrosoft.com]; Elsen, Henry [Elsen.Henry@epa.gov]; jgriffin@mt.gov;

Cord.Harris@bp.com; Dina Johnson [DLJohnson@environcorp.com]

**Subject**: FW: Health study Letter

A11,

FYI

----Original Message----

From: Peterson, Holly [mailto:HPeterson@mtech.edu]

Sent: Thursday, January 24, 2013 11:59 AM

To: Fritz Daily; Powers, Dan

Cc: Stacie Barry; bmcdonough@bresnan.net; Erik Nylund; helen.joyce@mse-ta.com; Matthew Vincent; Foley,

Dan

Subject: RE: Health study Letter

To Whomever It Concerns:

I have been trying to stay out of this, but I will add a few other points to Mr. Daily's comments:

- 1. The study proposes to analyze some blood lead data. Blood lead is not "health." Thus, you should not call the proposed project a "health study."
- 2. The blood lead program in Butte has many deficiencies, but ARCO/EPA did not design the program to be a comprehensive or conservative marker of exposure in Butte. They chose a small subset of the population to test, some of whom (i.e., pregnant women) happened to show the lowest blood lead levels in the 1990 University of Cincinnati study (also funded by ARCO). Thus, the data will be biased towards lower concentrations.
- The blood lead program has been very limited to whom is/was eligible for testing.
- 4. The blood lead data will not be sufficient to understand risks because the instrumentation used to analyze the samples had a detection level that was too high. (For example, recent medical research has shown behavioral and learning problems in children and young adults at much lower blood lead levels than the detection limit used in the Butte program.)
- 5. Lead is only one of the contaminants of concern in Butte. Arsenic exposure should also be a primary focus. While the EPA has publicly claimed to have years of urinary arsenic data, it is not true.
- 6. The consulting firm chosen to perform the study has been intimately involved with ARCO for many years. These people are not independent, third-party experts.
- 7. Samples of soil and dust in Butte have indicated that the contamination is not evenly-spread throughout Butte and Silver Bow County; thus, a comprehensive health study of disease rates, mortality rates, and other health-related problems on neighborhood scales is needed.

Sincerely,

Holly Peterson

3015 Ottawa

Butte, MT 59701

From: Fritz Daily [buttedaily@bresnan.net] Sent: Wednesday, January 23, 2013 11:48 AM

To: Powers, Dan Cc: Peterson, Holly; Stacie Barry; bmcdonough@bresnan.net; Erik Nylund; helen.joyce@mse-ta.com; Matthew

Vincent; dfoley@bsb.mt.gov Subject: Health study Letter

Dan,

Please include this letter in the official record addressing my concerns with the recent Health Study conducted by your office, Arco and the agencies.

Fritz